

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

In re:

CITY OF DETROIT, MICHIGAN  
\_\_\_\_\_  
Debtor \_\_\_ /

Case No. 13-53846  
Chapter 9  
Hon. STEVEN W. RHODES

OBJECTION TO ELIGIBILITY OF CITY OF DETROIT FOR CHAPTER 9  
FILED BY MICHIGAN AUTO RECOVERY, INC.

Michigan Auto Recovery, Inc. comes by its Counsel, KURT THORNBLADH P25858, and for its Objection to Eligibility of the City of Detroit for Chapter 9 says as follows:

1. The City of Detroit filed a petition for relief under Chapter 9 of the U.S. Bankruptcy Court on July 18, 2013.
2. Michigan Auto Recovery Service, Inc. is a creditor of the City of Detroit, Michigan and has a claim for over \$300,000 for towing services performed for the City.
3. Michigan Auto Recovery, Inc. was not given a fair opportunity to negotiate its claim prior to the filing of Chapter 9 by the City of Detroit.
4. Michigan Auto Recovery Service, Inc. challenges the eligibility of the City of Detroit for Chapter 9 pursuant to 11 USC § 108(c)(5)(B).
5. There are 27 contract towers for the City of Detroit, and on information and belief, the City of Detroit has failed to negotiate in good faith with the towers prior to filing this case.

Wherefore Michigan Auto Recovery Service, Inc prays the Court will dismiss the Bankruptcy of The City of Detroit, Michigan.

FOR MICHIGAN AUTO RECOVERY SERVICE,  
Inc.  
By: /s/ kurt thornbladh  
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Dated: August 19, 2013

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In re:

CITY OF DETROIT, MICHIGAN

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CERTIFICATE OF SERVICE

Kurt Thornbladh certifies and says that on August 19, 2013 he served copies of Objection to Eligibility of the City of Detroit, Michigan to file Chapter 9 as follows:

1. The following were served by electronic notification:

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2. And the parties to the attached matrix provided by the Clerk of the U.S. Bankruptcy Court  
were served by First Class U.S. Mail.

\_\_\_\_/s/\_kurt thornbladh\_\_\_\_\_  
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